UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

Case No. 24-cv-00959 (JMB/ECW) WNT, LLC, et al., Plaintiff, v. UNITED SUGAR PRODUCERS & REFINERS COOPERATIVE, et al., Defendants. Case No. 24-cv-00966 (JMB/ECW) MORELOS BAKERY LLC, Plaintiff, v. UNITED SUGAR PRODUCERS & REFINERS COOPERATIVE, et al., Defendants. UP AT 4, INC., Case No. 24-cv-00970 (JMB/ECW) Plaintiff, v. ASR GROUP INTERNATIONAL, INC., et al.,

QUARTERBACK CLUB, et al., Case No. 24-cv-01017 (JMB/ECW) Plaintiff, v. ASR GROUP INTERNATIONAL, INC., et al., Defendants. BW-SS, INC., Case No. 24-cv-01047 (JMB/ECW) Plaintiff, v. ASR GROUP INTERNATIONAL, INC., et al., Defendants. Case No. 24-cv-01106 (JMB/ECW) BOCA BOTANA'S INC., Plaintiff, v. UNITED SUGAR PRODUCERS & REFINERS COOPERATIVE, et al., Defendants.

KING KULLEN GROCERY CO., INC.,

Case No. 24-cv-01122 (JMB/ECW)

Plaintiff,

v.

ASR GROUP INTERNATIONAL, INC., *et al.*,

Defendants.

Case No. 24-cv-01129 (JMB/ECW)

RALEIGH GOLDEN,

Plaintiff,

v.

UNITED SUGAR PRODUCERS & REFINERS COOPERATIVE, et al.,

Defendants.

PIALA LLC,

Case No. 24-cv-01232 (JMB/ECW)

Plaintiff,

v.

UNITED SUGAR PRODUCERS & REFINERS COOPERATIVE, et al.,

THE UNION PUBLIC HOUSE, LLC,

Case No. 24-cv-01292 (JMB/ECW)

Plaintiff,

v.

AMERICAN SUGAR REFINING, INC., et al.,

Defendants.

WILSON COFFEE HOUSE, LLC,

Plaintiff,

v.

ASR GROUP INTERNATIONAL, INC., *et al.*,

Defendants.

CORBOS DELI SOUTHSIDE, LLC, et al.,

Plaintiff,

v.

UNITED SUGAR PRODUCERS & REFINERS COOPERATIVE, et al.,

Defendants.

Case No. 24-cv-01322 (JMB/ECW)

Case No. 24-cv-01370 (JMB/ECW)

NORTHERN FROZEN FOODS, INC.,

Case No. 24-cv-01414 (JMB/ECW)

Plaintiff,

v.

UNITED SUGAR PRODUCERS & REFINERS COOPERATIVE, et al.,

Defendants.

NINETEENSEVENTYNINE LLC, et al.,

Case No. 24-cv-01525 (JMB/ECW)

Plaintiff,

v.

ASR GROUP INTERNATIONAL, INC., *et al.*,

Defendants.

TRIPLE ELM COFFEE AND ICE CREAM, LLC,

Plaintiff,

v.

UNITED SUGAR PRODUCERS & REFINERS COOPERATIVE, et al.,

Defendants.

Case No. 24-cv-01536 (JMB/ECW)

MODERN PASTRY SHOP, INC.,

Case No. 24-cv-01537 (JMB/ECW)

Plaintiff,

v.

UNITED SUGAR PRODUCERS & REFINERS COOPERATIVE, et al.,

Defendants.

COWBELL GRILL & TAP, LLC, et al.,

Case No. 24-cv-01539 (JMB/ECW)

Case No. 24-cv-01560 (JMB/ECW)

Plaintiff,

v.

UNITED SUGAR PRODUCERS & REFINERS COOPERATIVE, et al.,

Defendants.

PORTLAND HUNT-ALPINE CLUB, LLC,

Plaintiff,

v.

ASR GROUP INTERNATIONAL, INC., *et al.*,

WESTERN AXE LLC, Case No. 24-cv-01653 (JMB/ECW) Plaintiff, v. ASR GROUP INTERNATIONAL, INC., et al., Defendants. NATILE INC, et al., Case No. 24-cv-01654 (JMB/ECW) Plaintiff, v. AMERICAN SUGAR REFINING, INC., et al., Defendants. Case No. 24-cv-01847 (JMB/ECW) MARY SALAZAR, et al., Plaintiff, v. UNITED SUGAR PRODUCERS &

REFINERS COOPERATIVE., et al.,

PATTIBAKES LLC, Case No. 24-cv-01847 (JMB/ECW) Plaintiff, v. AMERICAN SUGAR REFINING, INC., et al., Defendants. JENNIVEE'S BAKERY, LLC, Case No. 24-cv-01848 (JMB/ECW) Plaintiff, v. ASR GROUP INTERNATIONAL, INC., et al., Defendants. 2nd PITT LLC, Case No. 24-cv-01859 (JMB/ECW) Plaintiff, v. ASR GROUP INTERNATIONAL, INC., et al., Defendants.

HU-YU, INC. d/b/a CITY WOK, Case No. 24-cv-01903 (JMB/ECW) Plaintiff, v. ASR GROUP INTERNATIONAL, INC., et al., Defendants. JM HOSPITALITY GROUP, LLC, Case No. 24-cv-01907 (JMB/ECW) Plaintiff, v. AMERICAN SUGAR REFINING, INC., et al., Defendants. Case No. 24-cv-01913 (JMB/ECW) KLUESSENDORF, Plaintiff, v. UNITED SUGAR PRODUCERS & REFINERS COOPERATIVE, et al.,

KEDZIE BOULEVARD CAFÉ, INC.,

Case No. 24-cv-01949 (JMB/ECW)

Plaintiff,

v.

ASR GROUP INTERNATIONAL, INC., et al..

Defendants.

PLAINTIFFS' RULE 7.1(f) COMPLIANCE CERTIFICATE

The undersigned hereby certifies that, pursuant to Local Rule 7.1(f), Plaintiffs' Memorandum of Law in Support of Motion to Consolidate and Coordinate Actions, contains 2,235 words, as determined through the word count feature of the Microsoft Office Word 2016 word processing software used to prepare the memorandum. The word processing program has been applied specifically to include all text, including headings, footnotes, and quotations. The memorandum was prepared in 13-point font in accordance with the type size limitation of Local Rule 7.1(h).

Respectfully submitted,

DATED: May 29, 2024 /s/ Daniel C. Hedlund

Daniel E. Gustafson (#202241)

Daniel C. Hedlund (#258337)

Michelle J. Looby (#0388166)

Joshua J. Rissman (#0391500)

Anthony J. Stauber (#0401093)

GUSTAFSON GLUEK PLLC

Canadian Pacific Plaza

120 So. Sixth Street, Suite 2600

Minneapolis, MN 55402

Tel: (612) 333-8844

Fax: (612) 339-6622 dgustafson@gustafsongluek.com dhedlund@gustafsongluek.com mlooby@gustafsongluek.com jrissman@gustafsongluek.com tstauber@gustafsongluek.com

Dianne M. Nast Daniel N. Gallucci Joseph N. Roda Michele S. Burkholder Michael S. Tarringer NASTLAW LLC

1101 Market Street, Suite 2801 Philadelphia, Pennsylvania 19107

Tel: (215) 923-9300 Fax: (215) 923-9302 dnast@nastlaw.com dgallucci@nastlaw.com jnroda@nastlaw.com mburkholder@nastlaw.com mtarringer@nastlaw.com

Christopher V. Le Brian P. Drockton **BOIESBATTIN LLP** 4041 University Drive, 5th Floor

Fairfax, VA 22030 Tel: (703) 764-8700 Fax: (703) 764-8704 cle@boiesbattin.com bdrockton@boiesbattin.com

Kenneth A. Wexler (admitted *pro hac vice*)
Justin N. Boley (admitted *pro hac vice*)
WEXLER BOLEY & ELGERSMA LLP
311 S. Wacker Dr., Suite 5450
Chicago, IL 60606
Telephone: (312) 346-2222
kaw@wbe-llp.com
jnb@wbe-llp.com

Adam J. Zapala (admitted *pro hac vice*)

Elizabeth Castillo (admitted *pro hac vice*)
James G.B. Dallal (admitted *pro hac vice*)
COTCHETT, PITRE & MCCARTHY, LLP
840 Malcolm Road, Suite 200
Burlingame, CA 94010

Tel: (650) 697-6000 azapala@cpmlegal.com ecastillo@cpmlegal.com jdallal@cpmlegal.com

Alexander E. Barnett (admitted *pro hac vice*)

COTCHETT, PITRE & MCCARTHY, LLP

40 Worth Street, Ste. 602 New York, NY 10013 Tel: (212) 201-6820 abarnett@cpmlegal.com

Counsel for Plaintiff Northern Haserot

/s/ Bobby Pouya

Bobby Pouya

PEARSON WARSHAW, LLP

15165 Ventura Boulevard, Suite 400 Sherman Oaks, CA 91403

T: (818) 788-8300

F: (818) 788-8104 bpouya@pwfirm.com

Counsel for Consumer Class Plaintiffs Raleigh Golden, Mary Salazar, Liana Britt, Kimberly Rybarczyk, Amanda Boardman, and Virginia Smith

/s/ Kellie Lerner

Kellie Lerner

Ben Steinberg

Ellen Jalkut

Laura Song

ROBINS KAPLAN LLP

1325 Avenue of the Americas, Suite 2601 New York, NY 10019

Tel: (212) 980-7400 Fax: (212) 980-7499

klerner@robinskaplan.com bsteinberg@robinskaplan.com ejalkut@robinskaplan.com lsong@robinskaplan.com

Counsel for Plaintiffs Natile, Inc., Red Star Diner, Inc., The Coffee Bean LLC, Morelos Bakery LLC, WNT, LLC, and WNT Farmington LLC

/s/ Kimberly A. Justice

Kimberly A. Justice Jonathan M. Jagher

FREED KANNER LONDON & MILLEN LLC

923 Fayette Street

Conshohocken, Pennsylvania 19428 Telephone: (610) 234-6486 kiustiaa@fklmlayy.com

kjustice@fklmlaw.com jjagher@fklmlaw.com

Matthew W. Ruan Douglas A. Millen Michael E. Moskovitz

FREED KANNER LONDON & MILLEN LLC

100 Tri-State International, Suite 128 Lincolnshire, IL 60069 Telephone: (224) 632-4500 mruan@fklmlaw.com dmillen@fklmlaw.com mmoskovitz@fklmlaw.com

Counsel for Plaintiffs WNT, LLC and WNT Farmington, LLC

/s/ Heidi M. Silton

Heidi M. Silton (MN #025759X) Jessica N. Servais (MN #0326744) Joseph C. Bourne (MN #0389922) LOCKRIDGE GRINDAL NAUEN PLLP 100 Washington Avenue South, Suite 2200 Minneapolis, MN 55401

Tel: (612) 339-6900 Fax: (612) 339-0981 hmsilton@locklaw.com jnservais@locklaw.com jcbourne@locklaw.com

Counsel for Plaintiff Morelos Bakery LLC

/s/ David M. Cialkowski

David M. Cialkowski (MN# 0306526) Ian F. McFarland (MN# 0392900) Zachary J. Freese (MN# 0402252)

ZIMMERMAN REED, LLP

1100 IDS Center

 $80\ S.\ 8th\ St.$

Minneapolis, MN 55402

Tel: (612) 341-0400 Fax: (612) 341-0844

david.cialkowski@zimmreed.com ian.mcfarland@zimmreed.com zachary.freese@zimmreed.com

Counsel for Plaintiffs BW-SS, Inc., Nineteenseventynine LLC, Sublime Surprise, LLC, and Jennivee's Bakery, LLC

/s/ Heidi M. Silton

Heidi M. Silton (MN #025759X) Jessica N. Servais (MN #0326744) Joseph C. Bourne (MN #0389922) LOCKRIDGE GRINDAL NAUEN PLLP 100 Washington Avenue South, Suite 2200

Minneapolis, MN 55401

Tel: (612) 339-6900 Fax: (612) 339-0981 hmsilton@locklaw.com jnservais@locklaw.com

jcbourne@locklaw.com

W. Cameron Stephenson Matthew D. Schultz LEVIN, PAPANTONIO, RAFFERTY, PROCTOR, BUCHANAN, O'BRIEN, BARR & MOUGEY, P.A.

316 S. Baylen Street, Suite 600 Pensacola, FL 32502-5996

Tel: (850) 435-7176 Fax: (850) 436-6176

cstephenson@levinlaw.com mschultz@levinlaw.com

Counsel for Plaintiff THE UNION PUBLIC HOUSE, LLC

/s/ Heidi M. Silton

Heidi M. Silton (MN #025759X) Jessica N. Servais (MN #0326744) Joseph C. Bourne (MN #0389922)

LOCKRIDGE GRINDAL NAUEN PLLP

100 Washington Avenue South, Suite 2200 Minneapolis MN 55401

Minneapolis, MN 55401 Tel: (612) 339-6900

Fax: (612) 339-0981

hmsilton@locklaw.com

jnservais@locklaw.com jcbourne@locklaw.com

Jeffrey B. Gittleman Meghan J. Talbot

Zachary A. Pogust

POGUST GOODHEAD LLC

161 Washington Street, Suite 250 Conshohocken, PA 19428 Telephone: (610) 941-4204 jgittleman@pogustgoodhead.com mtalbot@pogustgoodhead.com zpogust@pogustgoodhead.com

Kevin I. Goldberg

GOLDBERG LAW, LLC

401 Salk Circle Gaithersburg, MD 20878 Telephone: (301) 343-5817 kg@goldberglaw.info

Counsel for Plaintiff BOCA BOTANA'S INC.

/s/ Anne T. Regan

Anne T. Regan (MN #0333852) Nathan D. Prosser (MN #0329745) Brian W. Nelson (MN #0398481)

HELLMUTH & JOHNSON, PLLC

8050 West 78th Street Edina, Minnesota 55439 Telephone: (952) 941-4005 Facsimile: (952) 941-2337 aregan@hjlawfirm.com nprosser@hjlawfirm.com bwnelson@hjlawfirm.com

Daniel Zemans (pro hac vice forthcoming) **LAW OFFICES OF DANIEL ZEMANS, LLC**

2023 W. Berteau Ave. Chicago, IL 60618 Phone: (773) 706-7767 dzemans@zemans-law.com

Counsel for Plaintiffs Western Axe LLC (d/b/a Mo's House of Axe) and Kedzie Boulevard Café, Inc. (d/b/a Scofflaw)

/s/ Heidi M. Silton

Heidi M. Silton (MN #025759X) Jessica N. Servais (MN #0326744) Joseph C. Bourne (MN #0389922)

LOCKRIDGE GRINDAL NAUEN PLLP

100 Washington Avenue South, Suite 2200 Minneapolis, MN 55401 Tel: (612) 339-6900

Fax: (612) 339-0981 hmsilton@locklaw.com jnservais@locklaw.com jcbourne@locklaw.com

Brian Murray (*pro hac vice* forthcoming)
Lee Albert (*pro hac vice* forthcoming)
Gregory Linkh (*pro hac vice* forthcoming)
GLANCY PRONGAY & MURRAY LLP

230 Park Avenue, Suite 358

New York, NY 10169

Tel: (212) 682-5340 Fax: (212) 884-0988 bmurray@glancylaw.com lalbert@glancylaw.com glinkh@glancylaw.com

Counsel for Plaintiffs CORBOS DELI SOUTHSIDE, LLC; and CORBO CORNER DELI, WEST LLC, and PATTIBAKES LLC

/s/ Garrett D. Blanchfield

Garrett D. Blanchfield

Brant D. Penney

REINHARDT WENDORF & BLANCHFIELD

80 South 8th Street, Suite 900 Minneapolis, MN 55402 Telephone: (651) 287-2100 g.blanchfield@rwblawfirm.com

b.penney@rwblawfim.com

Counsel for Plaintiff Sandra Kluessendorf

/s/ Heidi M. Silton

Heidi M. Silton (MN #025759X)

Jessica N. Servais (MN #0326744)

Joseph C. Bourne (MN #0389922)

LOCKRIDGE GRINDAL NAUEN PLLP

100 Washington Avenue South, Suite 2200 Minneapolis, MN 55401

Tel: (612) 339-6900 Fax: (612) 339-0981 hmsilton@locklaw.com jnservais@locklaw.com jcbourne@locklaw.com

Bryan L. Clobes (pro hac vice forthcoming) Ellen Meriwether (pro hac vice forthcoming) Daniel J. Herrera (pro hac vice forthcoming) Mohammed Rathur (pro hac vice forthcoming) **CAFFERTY CLOBES MERIWETHER &**

SPRENGEL LLP

135 South LaSalle Street, Suite 3210 Chicago, IL 60603 T: (312) 782-4880 bclobes@caffertyclobes.com emeriwether@caffertyclobes.com dherrera@caffertyclobes.com mrathur@caffertyclobes.com

Counsel for Plaintiff Hu-Yu, Inc. (d/b/a City Wok)

/s/ Heidi M. Silton

Heidi M. Silton

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

100 Washington Avenue South, Suite 2200 Minneapolis, MN 55401-2159

Tel: (612) 596-4092

E-mail: hmsilton@locklaw.com

David E. Kovel (*pro hac vice* forthcoming) Thomas W. Elrod (*pro hac vice* forthcoming) David Bishop (*pro hac vice* forthcoming)

KIRBY McINERNEY LLP

250 Park Avenue Suite 820

New York, NY 10177 Tel: (212) 371-6600

E-mail: dkovel@kmllp.com

telrod@kmllp.com

Anthony F. Fata (*pro hac vice* forthcoming) Anthony E. Maneiro (*pro hac vice* forthcoming)

KIRBY McINERNEY LLP

211 West Wacker Drive, Suite 550

Chicago, IL 60606 Tel.: (312) 767-5180

Email: afata@kmllp.com amaneiro@kmllp.com

Counsel for Plaintiff King Kullen Grocery Co., Inc.

/s/ Matthew W. Ruan

Matthew W. Ruan (MN #033909X)

FREED KANNER LONDON & MILLEN LLC

100 Tri-State International, Suite 128 Lincolnshire, IL 60069 Tel: (224) 632-4500 mruan@fklmlaw.com

/s/ Stuart G. Gross

Stuart G. Gross

GROSS KLEIN PC

The Embarcadero

Pier 9, Suite 100

San Francisco, CA 94111

Telephone: (415) 671-4628

sgross@grosskleinlaw.com

Counsel for Plaintiff Piala LLC

/s/ Jon A. Tostrud

Jon A. Tostrud (MN Bar No. 199502)

Anthony M. Carter (pro hac vice forthcoming)

TOSTRUD LAW GROUP, P.C.

1925 Century Park East, Suite 2100

Los Angeles, CA 90067

Telephone: (310) 278-2600

Facsimile: (310) 278-2640 jtostrud@tostrudlaw.com

acarter@tostrudlaw.com

Don Barrett (pro hac vice forthcoming) Sarah Sterling Aldridge (pro hac vice forthcoming) Katherine Barrett Riley (pro hac vice forthcoming)

BARRETT LAW GROUP, P.A.

P.O. Box 927

404 Court Square North

Lexington, Mississippi 39095-0927

Telephone: (662) 834-9168 Facsimile: (662) 834-2628 donbarrettpa@gmail.com saldridge@barrettlawgroup.com kbriley@barrettlawgroup.com

J. Barton Goplerud (pro hac vice forthcoming)

SHINDLER, ANDERSON, GOPLERUD & WEESE, P.C.

5015 Grand Ridge Drive Suite 100 West Des Moines, IA 50265 Telephone: (515) 223-4567 goplerud@sagwlaw.com marty@sagwlaw.com

Counsel for Plaintiffs Quarterback Club and Glady's Restaurant, LLC (d/b/a Gladys')

<u>s/ Vildan A. Teske</u>

Vildan A. Teske (MN#241404) TESKE LAW PLLC 80 South Eighth Street, Suite 900 Minneapolis, MN 55402 Tel: (612) 746-1558 teske@teskelaw.com

Kevin Landau Archana Tamoshunas Miles Greaves TAUS, CEBULASH & LANDAU, LLC 123 Williams St., Suite 1900A New York, NY 10038 Telephone: (212) 931-0704 klandau@tcllaw.com atamoshunas@tcllaw.com mgreaves@tcllaw.com

Counsel for Plaintiff JM Hospitality Group, LLC

/s/ Shawn M. Raiter

Shawn M. Raiter (MN#240424)

LARSON · KING LLP

30 East Seventh Street, Suite 2800

St. Paul, MN 55101

Telephone: (651)312-6518 sraiter@larsonking.com

Michael J. Flannery (pro hac vice)

CUNEO GILBERT & LADUCA, LLP

Two City Place Drive Second Floor St. Louis, MO 63141 Telephone: (314) 226-1015 mflannery@cuneolaw.com

Cody McCracken (pro hac vice)

Lissa Morgans (pro hac vice)

CUNEO GILBERT & LADUCA, LLP

4725 Wisconsin Ave. NW

Suite 200

Washington, DC 20016

Telephone: 202.789.3960

Facsimile: 202.589.1813

cmccracken@cuneolaw.com

lmorgans@cuneolaw.com

Counsel for Plaintiff UP at 4, Inc. (d/b/a Great Harvest Bread Co. (Duluth, MN))

/s/ Shawn M. Raiter

Shawn M. Raiter (MN#240424)

LARSON · KING LLP

30 East Seventh Street, Suite 2800

St. Paul, MN 55101

Telephone: (651)312-6518 sraiter@larsonking.com

Michael J. Flannery (pro hac vice)

CUNEO GILBERT & LADUCA, LLP

Two City Place Drive

Second Floor

St. Louis, MO 63141

Telephone: (314) 226-1015

mflannery@cuneolaw.com

Cody McCracken (pro hac vice)

Lissa Morgans (pro hac vice)

CUNEO GILBERT & LADUCA, LLP

4725 Wisconsin Ave. NW

Suite 200

Washington, DC 20016

Telephone: 202.789.3960

Facsimile: 202.589.1813

cmccracken@cuneolaw.com

lmorgans@cuneolaw.com

J. Barton Goplerud (pro hac vice)

SHINDELAR, ANDERSON, GOPLERUD & WEESE, P.C.

5015 Grand Ridge Drive, Suite 100

West Des Moines, IA 50265

Telephone: (515) 223-4567

goplerud@sagwlaw.com

Jon Tostrud (MN#0251768)

Anthony Carter (pro hac vice)

TOSTRUD LAW GROUP, PC

1925 Century Park East

Suite 2100

Los Angeles, CA 90067

Telephone: (310) 278-2600

jtostrud@tostrudlaw.com

acarter@tostrudlaw.com

Counsel for Plaintiff Wilson Coffee House, LLC (d/b/a Linden Street Coffee House)

/s/ Shawn M. Raiter

Shawn M. Raiter (MN#240424)

LARSON · KING LLP

30 East Seventh Street, Suite 2800

St. Paul, MN 55101

Telephone: (651)312-6518

sraiter@larsonking.com

Michael J. Flannery (pro hac vice)

CUNEO GILBERT & LADUCA, LLP

Two City Place Drive

Second Floor

St. Louis, MO 63141

Telephone: (314) 226-1015 mflannery@cuneolaw.com

Daniel M. Cohen

Cody McCracken (pro hac vice)

Lissa Morgans (pro hac vice)

CUNEO GILBERT & LADUCA, LLP

4725 Wisconsin Ave. NW

Suite 200

Washington, DC 20016

Telephone: 202.789.3960

Facsimile: 202.589.1813

danielc@cuneolaw.com

cmccracken@cuneolaw.com

lmorgans@cuneolaw.com

Counsel for Plaintiff Portland Hunt-Alpine Club, LLC

/s/ Shawn M. Raiter

Shawn M. Raiter (MN#240424)

LARSON · KING LLP

30 East Seventh Street, Suite 2800

St. Paul, MN 55101

Telephone: (651)312-6518 sraiter@larsonking.com

Michael J. Flannery (pro hac vice)

CUNEO GILBERT & LADUCA, LLP

Two City Place Drive

Second Floor St. Louis, MO 63141 Telephone: (314) 226-1015 mflannery@cuneolaw.com

Cody McCracken (pro hac vice)
Lissa Morgans (pro hac vice)
CUNEO GILBERT & LADUCA, LLP
4725 Wisconsin Ave. NW
Suite 200
Washington, DC 20016

Telephone: 202.789.3960 Facsimile: 202.589.1813 cmccracken@cuneolaw.com lmorgans@cuneolaw.com

Counsel for Plaintiff 2nd Pit LLC